

May 21, 2024

BY ECF

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

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Re: United States v. Ryan Salame, No. 1:22-cr-673-  
LAK (S.D.N.Y.)

Dear Judge Kaplan:

On behalf of Ryan Salame, we respectfully submit the attached additional letters of support in connection with the sentencing in the above-captioned matter, currently scheduled for Tuesday, May 28 at 11 a.m. These additional letters supplement Mr. Salame's sentencing memorandum filed on May 14, 2024. *See* Dkt. No. 433.

Pursuant to the Court's Individual Rules of Practice for Sentencing Proceedings, we also respectfully request an order permitting the redaction of personally identifying information contained within the supplemental letters —namely, email addresses, home addresses, and phone numbers of certain individuals who have submitted letters of support on behalf of Mr. Salame. These letters of support, which supplement the letters already submitted with Mr. Salame's sentencing memorandum, are attached to this request as Exhibit C.

As set forth in the Court's Individual Rules of Practice, Mr. Salame's redaction request is narrowly tailored to serve the privacy interests of the third parties who authored these letters of support. *See United States v. Amodeo*, 71 F.3d 1044, 1048, 1050–51 (2d Cir. 1995) (finding privacy interests of third parties compelling reason to justify sealing). Such information adds little to the public record, while disclosure of this information would create significant privacy concerns for innocent third parties given the media attention this case has drawn. *See Gardner v. Newsday, Inc.*, 895 F.2d 74, 79–80 (2d Cir. 1990). The sealing is narrowly tailored to ensure the substance of each letter and the identity of the individual who authored each letter will remain fully accessible to the public. The Court previously granted a similar request in this matter. *See* Dkt. No. 435.

For the foregoing reasons, we respectfully request that the Court grant Mr. Salame's redaction request.

Mayer Brown LLP

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Respectfully submitted,

/s/ Gina M. Parlovecchio

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